

[Counsel on signature page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

*In Re Google Generative AI Copyright Litigation*

Case No. 5:23-cv-03440-EKL

Consolidated Case No. 5:24-cv-02531-EKL

**STIPULATION & [PROPOSED] ORDER  
EXTENDING TIME TO RESPOND TO  
MOTION TO STRIKE AND REQUEST  
FOR JUDICIAL NOTICE**

Judge: Hon. Eumi K. Lee

CASE NUMBERS: 5:23-cv-03440-EKL AND 5:24-cv-02531-EKL

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO  
MOTION TO STRIKE AND REQUEST FOR JUDICIAL NOTICE

1 The parties to the above-referenced action, through their respective counsel of record, hereby  
2 stipulate to the following regarding the time to respond to Defendants' Motion to Strike and Request  
3 for Judicial Notice:

4 WHEREAS, Defendants filed a Motion to Dismiss the Consolidated Amended Complaint on  
5 January 17, 2025, Dkt. No. 95 ("Motion to Dismiss");

6 WHEREAS, Defendants simultaneously filed a Request for Judicial Notice and Consideration  
7 of Materials Incorporated by Reference in Support of the Motion to Dismiss the Consolidated  
8 Complaint, Dkt. No. 96 ("Request for Judicial Notice"), and a Motion to Strike Class Allegations,  
9 Dkt. No. 98 ("Motion to Strike");

10 WHEREAS, pursuant to the Court's Order at Dkt. No. 88, Plaintiffs' deadline to respond to  
11 the Motion to Dismiss is February 7, 2025, and Defendants' deadline to file a reply in support of the  
12 Motion to Dismiss is February 21, 2025;

13 WHEREAS, in the absence of a clarifying court order and pursuant to the local rules,  
14 Plaintiffs' deadline to respond to the Request for Judicial Notice and the Motion to Strike may be  
15 January 31, 2025, and Defendants' deadline for reply briefs may be February 7, 2025;

16 WHEREAS, Defendants' Motion to Dismiss and Motion to Strike are both noticed for hearing  
17 on April 23, 2025 at 10:00 a.m.; and

18 WHEREAS, the Parties agree that, for efficiency and consistency, responses and replies to all  
19 of these motions should be submitted simultaneously;

20 It is hereby stipulated as follows:

21 1. Plaintiffs' Responses to the Motion to Strike and the Request for Judicial Notice shall  
22 be due on February 7, 2025, the same date that Plaintiffs' Response to the Motion to Dismiss is due;

23 2. Defendants' Replies in Support of the Motion to Strike and the Request for Judicial  
24 Notice shall be due on February 21, 2025, the same date that Defendants' Reply in Support of the  
25 Motion to Dismiss is due; and

26 3. The hearing on Defendants' Motion to Dismiss and Motion to Strike is unaffected by  
27 this order and remains set for April 23, 2025.

**IT IS SO STIPULATED.**

[Signature Pages Follow]

1 Dated: January 24, 2025

Respectfully Submitted,

2 By: /s/ Joseph R. Saveri

3 Joseph R. Saveri (State Bar No. 130064)  
4 Cadio Zirpoli (State Bar No. 179108)  
5 Christopher K.L. Young (State Bar No. 318371)  
6 Elissa A. Buchanan (State Bar No. 249996)  
7 Evan Creutz (State Bar No. 349728)  
8 **JOSEPH SAVERI LAW FIRM, LLP**  
9 601 California Street, Suite 1505  
10 San Francisco, California 94108  
11 Telephone: (415) 500-6800  
12 Facsimile: (415) 395-9940  
13 Email: jsaveri@saverilawfirm.com  
14 czirpoli@saverilawfirm.com  
15 cyoung@saverilawfirm.com  
16 eabuchanan@saverilawfirm.com  
17 ecreutz@saverilawfirm.com

12 Lesley E. Weaver (State Bar No. 191305)  
13 Anne K. Davis (State Bar No. 267909)  
14 Joshua D. Samra (State Bar No. 313050)  
15 **BLEICHMAR FONTI & AULD LLP**  
16 1330 Broadway, Suite 630  
17 Oakland, CA 94612  
18 Telephone: (415) 445-4003  
19 Email: lweaver@bfalaw.com  
20 adavis@bfalaw.com  
21 jsamra@bfalaw.com

18 Gregory S. Mullens (*pro hac vice*)  
19 **BLEICHMAR FONTI & AULD LLP**  
20 75 Virginia Road, 2<sup>nd</sup> Floor  
21 White Plains, NY 10603  
22 Telephone: (415) 445-4006  
23 Email: gmullens@bfalaw.com

21 Ryan J. Clarkson (State Bar No. 257074)  
22 Yana Hart (State Bar No. 306499)  
23 Mark I. Richards (State Bar No. 321252)  
24 Tiara Aveness (State Bar No. 343928)  
25 **CLARKSON LAW FIRM, P.C.**  
26 22525 Pacific Coast Highway  
27 Malibu, CA 90265  
28 Telephone: (213) 788-4050  
Email: rclarkson@clarksonlawfirm.com  
yhart@clarksonlawfirm.com  
mrichards@clarksonlawfirm.com  
tavaness@clarksonlawfirm.com

Tracey Cowan (State Bar No. 250053)  
**CLARKSON LAW FIRM, P.C.**  
95 Third Street, Second Floor  
San Francisco, CA 94103  
Telephone (213) 788-4050  
Email: tcowan@clarksonlawfirm.com

Brian D. Clark (*pro hac vice*)  
Laura M. Matson (*pro hac vice*)  
Arielle Wagner (*pro hac vice*)  
Eura Chang (*pro hac vice*)  
**LOCKRIDGE GRINDAL NAUEN P.L.L.P.**  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Telephone: (612)339-6900  
Facsimile: (612)339-0981  
Email: bdclark@locklaw.com  
lmmatson@locklaw.com  
aswagner@locklaw.com  
echang@locklaw.com

Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, #406  
Los Angeles, CA 90027  
Telephone: (323) 968-2632  
Facsimile: (415) 395-9940  
Email: mb@buttericklaw.com

*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

1  
2 Dated: January 24, 2025

Respectfully Submitted,

/s/ Paul J. Sampson

David H. Kramer (SBN 168452)

Maura L. Rees (SBN 191698)

**WILSON SONSINI GOODRICH & ROSATI P.C.**

650 Page Mill Road

Palo Alto, CA 94304-1050

Telephone: (650) 493-9300

dkramer@wsgr.com

mrees@wsgr.com

Eric P. Tuttle (SBN 248440)

**WILSON SONSINI GOODRICH & ROSATI P.C.**

701 Fifth Avenue, Suite 5100

Seattle, WA 98104-7036

Telephone: (206) 883-2500

Eric.tuttle@wsgr.com

Paul J. Sampson (*pro hac vice*)

**WILSON SONSINI GOODRICH & ROSATI P.C.**

15 West South Temple

Gateway Tower West, Suite 1700

Salt Lake City, UT 84101-1560

Telephone: (801) 401-8541

psampson@wsgr.com

*Attorneys for Defendants Google LLC and Alphabet Inc.*

**[PROPOSED] ORDER**

**PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
Hon. Eumi K. Lee  
United States District Court Judge

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Laura M. Matson, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 24th day of January, 2025, at Minneapolis, Minnesota.

/s/ Laura M. Matson

Laura M. Matson

**CERTIFICATE OF SERVICE**

I, Laura M. Matson, hereby certify that on January 24, 2025, I electronically filed the foregoing document with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which will send electronic notification to all counsel of record.

/s/ Laura M. Matson  
Laura M. Matson